## **Knittel, Janette**

From: Knittel, Janette

**Sent:** Friday, April 02, 2021 12:00 PM

**To:** Tasya Gray

**Subject:** RE: Former Rhone Poulenc Pre-Sampling Monitoring Well Redevelopment

**Categories:** FOIA, Rhone-Poulenc, Print or Save

Thank you for the update.

From: Tasya Gray <ngray@dofnw.com> Sent: Friday, April 02, 2021 11:32 AM

To: Knittel, Janette < Knittel. Janette@epa.gov>

Subject: RE: Former Rhone Poulenc Pre-Sampling Monitoring Well Redevelopment

Thanks for the prompt review Janette and the references – I have included it the draft work plan. The drillers pushed us one day, but we are slated for Tuesday to begin development.

The client was reviewing the work plan this week – hoping they send me their comments/questions on it still today so I can push out the plan but I don't quite have green light yet, hopefully very soon.

Tasya

From: Knittel, Janette < Knittel. Janette@epa.gov >

**Sent:** Thursday, April 1, 2021 1:47 PM **To:** Tasya Gray <ngray@dofnw.com>

Subject: RE: Former Rhone Poulenc Pre-Sampling Monitoring Well Redevelopment

Hi Tasya. We have no questions or concerns, EPA approves your redevelopment plan. René had the suggestion to send you the attached guidance documents. He says he prefers the 1992 document because it tends to discuss criteria for development and time to wait after development. He said that overall your proposed approach is close or similar. But now you have these if you need a reference to add to your plan unless you already have an SOP to include in the plan.

Regards, Janette

## Janette Knittel

U.S. EPA Region 10
Land, Chemical, and Redevelopment Division
RCRA Corrective Action, Permits, and PCB Section
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From: Tasya Gray <ngray@dofnw.com>
Sent: Saturday, March 27, 2021 10:57 AM
To: Knittel, Janette <Knittel.Janette@epa.gov>

Subject: Former Rhone Poulenc Pre-Sampling Monitoring Well Redevelopment

Hi Janette,

The work plan is in client review, we will turn it around to you as soon as possible this week.

Based on the well inspections performed this month on wells being considered for sampling we are proposing to redevelop seven monitoring wells prior to implementation of the Pre-CMS Data Collection Work Plan. The wells were selected for redevelopment following:

- Field assessment of total well depths to evaluate sedimentation.
- Review of recent sampling forms, when available, to evaluate if significant decreases in purge rates or water level drawdown occurred.

The following wells were selected for redevelopment based on sedimentation (none were identified based on purge rate or water level drawdown issues). We paid particular attention to wells considered for PCB sampling and concerns around turbidity for that.

- 1. B6
- 2. MW-22
- 3. MW-38R
- 4. MW-40
- 5. DM-4
- 6. MW-46
- 7. MW-39

Our general approach to redevelopment of the monitoring wells will include the following tasks:

- Removal of the pump from the well (if present).
- Measurement of the static water level and calculate well volume including the sand pack.
- Lowering a surge block into the well and vigorously moving the surge block up and down in the well creating a surging action across the screened interval to bring the finer grained materials into suspension.
- Removing the surge block and beginning to purge the well at a sufficient rate to remove fines. Initiating physical water quality testing for turbidity at a minimum frequency of every 1/5<sup>th</sup> the well volume removed.
- Repeating surging and purging process and monitoring turbidity declines.
- Measuring the total depth of the well after development.
- Transferring purge water to the GWPT building for processing through the treatment system.
- Closing the well appropriately and recording any well integrity concerns in the field book.

DOF is prepared to perform redevelopment work the week of April 5, 2021 if EPA concurs with the scope and plan provided above. Let me know if you would like to discuss further. Thanks,

Tasya

## Tasya Gray, LG

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